

# *LAW OFFICES OF DAVID O'CONNOR, P.C.*

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*December 11, 2015*

**VIA ECF**

Honorable Magistrate Judge Lois Bloom  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn NY 11201

*Re: Allstate Insurance Company et al, v. Demarco, et al;  
Docket No: 1:15-cv-04561-ERK-LB*

Dear Magistrate Judge Bloom:

There was much discussion regarding the relief sought in our letter motion filed today during the last conference wherein plaintiffs objected to any stay. Mr. Zimmerman proposed a short stay during his conversation with Mr. Whitcher earlier today while plaintiff would have an opportunity to oppose the motion in an effort to avoid the necessity of an immediate conference. Mr. Whitcher categorically refused any stay and insisted that he be given the full time provided by Rule to oppose without any stay in effect.

In our letter motion, we request an immediate stay of discovery pending a full briefing of this motion. We believe that it is in the interests of justice to provide an immediate stay and there is no prejudice to having counsel keep any records received in a sealed manner and to stay any deadlines for discovery responses pending a decision on the motion to stay.

We request either a stay pending a full briefing and argument on the issue or a conference this afternoon to discuss same or, if not this afternoon, as soon as the Court can arrange. Thank you for your time and consideration. We, again, apologize for the late nature of this motion; however, we have limited resources to devote as I am a solo practitioner and only have the help as available from Mr. Zimmerman.

Law Offices of David O'Connor, PC

By: David O'Connor, Esq.  
David O'Connor (DO 7290)

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